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November 4, 2021

VIA ECF

Hon. Colleen McMahon
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Room 2550
New York, New York 10007

Re: ***Larry W. Jander and Richard J. Waksman v. Retirement Plans Committee of IBM, Richard Carroll, Martin Schroeter, and Robert Weber***
Civil Action No. 15-cv-3781 (WHP)

Dear Judge McMahon,

On behalf of plaintiffs Richard Waksman and Larry Jander, we write pursuant to Section II(A) of Plan of Allocation,¹ approved by the Court in connection with the settlement of the above captioned matter, to request that the Court enter an order directing CRIS to disburse the following amounts from the Net Settlement fund. First, \$980,894.86 to the Settlement Administrator for distribution to Participants Without Active Plan Accounts. Second, \$2,091,259.24 to the Record Keeper and Trustee for distribution to Participants With Active Plan Accounts.

These amounts were calculated pursuant to the Plan of Allocation by the Settlement Administrator and have been reviewed by Class Counsel and Counsel for Defendants. We are available at the Court's convenience to answer any questions.

Respectfully submitted,
/s/ Matthew P. Hendrickson

SO ORDERED:

Colleen McMahon, U.S.D.J.

¹ Docket No. 117-6. Capitalized terms have the meaning assigned to them therein.